

Exhibit A



Claim Form

In the High Court of Justice
Business and Property Courts of
England and Wales
King's Bench Division
Commercial Court

for court use only

Claim no.	CL-2023-000054
Issue date	

SEAL

Claimant(s)

- (1) TRAFIGURA PTE LTD
10 Collyer Quay, #29-01/05, Ocean Financial Centre, Singapore 049315
(2) TRAFIGURA INDIA PVT LIMITED
Unit No. 1101, A Wing, One BKC, Plot No. C-66, G Block, Bandra Kurla
Complex, Bandra (East) Mumbai, MH 400051 IN, India.

Defendant(s)

- (1) PRATEEK GUPTA
(2) UIL (SINGAPORE) PTE. LTD.
(3) UIL MALAYSIA LTD.
(4) TMT METALS AG, ZUG
(5) TMT METALS (UK) LTD
(6) SPRING METAL LIMITED
(7) MINE CRAFT LIMITED
(8) NEW ALLOYS TRADING PTE. LTD.

Name and address of Defendant receiving this claim form

See separate sheet

	£
Amount claimed	>US\$600m
Court fee	£10,000
Legal representative's costs	TBC
Total amount	TBC

The court office at the Admiralty and Commercial Court Listing Office, Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL is open between 10 am and 4.30 pm Monday to Friday. When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number.

Brief details of claim

From time to time, Cs bought cargoes of what they were told were nickel cathodes and/or briquettes from Ds 2-8. In fact, many (if not all) of those cargoes contained much less valuable materials. This has left Cs holding materials worth much less than that for which they paid, and (to the extent that Cs have on-sold the relevant cargoes) has exposed them to actual or potential liability to their counterparties.

It is Cs' case that they were induced to buy the relevant cargoes (and, in some cases, to agree to re-sell them to Ds who have not paid for the same) by fraudulent misrepresentations (made by, on behalf of, and pursuant to a conspiracy between, Ds) that they contained nickel cathodes and/or briquettes. They therefore hereby rescind the relevant transactions (or, to the extent necessary, will seek an order for rescission in equity of the same), together with appropriate relief enabling them to identify and recover the money which they paid to Ds pursuant to the same.

Cs also bring tortious claims, and seek damages in tort, against Ds including (a) claims in deceit and conspiracy against all Ds; and (b) claims in procuring breach of contract against D1.

In the alternative, and only if and to the extent that they are found not to have rescinded (or to be entitled to an order rescinding) the relevant transactions, Cs will advance a contractual claim for damages against Ds 2-8, arising out of their failure to deliver the material which they were contractually obliged to deliver.

Particulars of claim (~~*attached~~)(*will follow if an acknowledgment of service is filed that indicates an intention to defend the claim)

Stephenson Harwood LLP
1 Finsbury Circus
London
EC2M 7SH

DX No. 64 Chancery Lane

Claimant's or legal representative's address
to which documents or payments should be
sent if different from overleaf including (if
appropriate) details of DX, fax or e-mail.

Statement of truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

☒ **The Claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature

Joseph Francis O'Keeffe

☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

08

Month

02

Year

2023

Full name

Joseph Francis O'Keeffe

Name of claimant's legal representative's firm

Stephenson Harwood LLP

If signing on behalf of firm or company give position or office held

Partner

Claim No. []

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND & WALES
COMMERCIAL COURT (KBD)**

B E T W E E N :

**TRAFIGURA PTE LTD
TRAFIGURA INDIA PVT LTD**

Claimants

- and -

**MR PRATEEK GUPTA
UIL (SINGAPORE) PTE. LTD.
UIL MALAYSIA LTD.
TMT METALS AG, ZUG
TMT METALS (UK) LTD
SPRING METAL LIMITED
MINE CRAFT LIMITED
NEW ALLOYS TRADING PTE. LTD.**

Defendants

DETAILS OF DEFENDANTS

(1) PRATEEK GUPTA

Villa K-01
Fronde K, Palm Jumeirah
Dubai, UAE

(2) UIL (SINGAPORE) PTE. LTD.

160 Robinson Road
#13-07/08/09 Singapore Business Federation Centre
Singapore 068914, Singapore

(3) UIL MALAYSIA LTD.

Brumby Centre
Lot 42, Jalan Muhibbah
8700 Federal Territory of Labuan, Malaysia

(4) TMT METALS AG, ZUG

Baarerstrasse 71
6300 Zug, Switzerland

(5) **TMT METALS (UK) LTD**

35 New Broad Street
London, England
EC2M 1NH

(6) **SPRING METAL LIMITED**

Unit 3A-25 U0350, 3rd Floor
Labuan Times Square
Jalan Merdeka
Labuan F.T. 87007
Malaysia

(7) **MINE CRAFT LIMITED**

Level 12, One Peking
Tsim Sha Tsui
Kowloon, Hong Kong

(8) **NEW ALLOYS TRADING PTE. LTD.**

120 Robinson Road
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Singapore, 068913